

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA)	Criminal No. 2:10-cr-0004
)	
v.)	
)	
JOSEPH PAPP)	Lancaster, C.J.

MOTION TO WITHDRAW AS COUNSEL

AND NOW come William F. Ward, Esquire (“Counsel), and the law firm of Ward McGough, LLC (“the Firm”), and hereby move for Leave of Court to Withdraw as attorneys for the Defendant, Joseph Papp (“Papp”), in the above-captioned case.

In support of this motion, Counsel respectfully avers as follows:

1. On January 13, 2010, the United States filed a two-count information against Papp, each count charging him with conspiracy.
2. On February 17, 2010, Counsel and the Firm entered an appearance as attorneys for Papp.
3. On February 17, 2010, Papp waived his right to indictment and entered his plea of guilty to both offenses.
4. Sentencing is scheduled for May 20, 2011.
5. On January 14, 2011, Counsel will leave the private practice of law and will close the legal operations of the Firm, in anticipation of taking a position in state government, effective January 18, 2011.

6. It is believed and therefore averred that Papp will qualify for the appointment of counsel to represent him at the sentencing hearing in May 2011.

7. On January 13, 2011, AUSA Mary McKeen Houghton indicated that the government does not object to the relief requested in this motion.

WHEREFORE, based upon the foregoing, the undersigned Counsel respectfully requests that his motion be granted and that an Order be entered permitting him and the Firm to withdraw as attorneys for Papp in the above-captioned case.

Respectfully submitted,

WARD McGOUGH, LLC

By: /s/ William F. Ward
William F. Ward
Pa. I.D. No. 25266

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing *Motion to Withdraw as Counsel* has been served on this 13th day of January, 2011, upon the following:

Mary McKeen Houghton, Esquire
Assistant United States Attorney
Western District of Pennsylvania
4000 United States Post Office & Courthouse
Pittsburgh, PA 15219
(By ECF mail)

Mr. Joseph Papp
5887 Keystone Drive
Bethel Park, PA 15102
(By First Class Mail)

/s/ William F. Ward

William F. Ward